

ORIGINAL

United States District Court  
Southern District of New York

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UNITED STATES OF AMERICA

- v. -

ISHI WONEY,

a/k/a "Zoe,"

a/k/a "Z,"

a/k/a "Ish,"

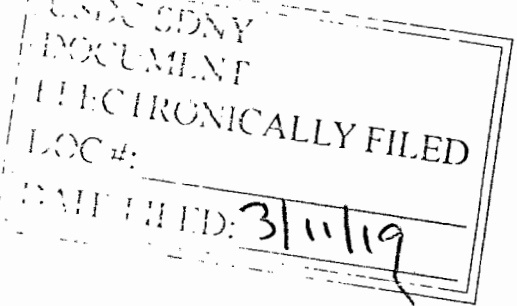
a/k/a "Izy,"

Defendant.

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SUPERSEDING  
INDICTMENT

SL 18-Cr-832 (LGS)



COUNT ONE

(Sex Trafficking by Force, Fraud, or Coercion)

The Grand Jury charges:

1. In or about 2016, within the Southern District of New York and elsewhere, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and attempted to do so, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, and attempted to do so, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to

cause such persons to engage in one and more commercial sex acts, to wit, WONEY recruited, harbored, transported, provided, obtained, advertised, and maintained a female person, Victim-4,<sup>1</sup> knowing that, and in reckless disregard of the fact that, force, threats of force, fraud, coercion, and a combination of such means, were used to cause Victim-4 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to WONEY.

(Title 18, United States Code, Sections 1591(a), (b)(1); 1594(a); and 2.)

#### COUNT TWO

(Sex Trafficking of a Minor)

The Grand Jury further charges:

2. From in or about September 2018, up to and including on or about October 27, 2018, in the Southern District of New York and elsewhere, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and attempted to do so, and did benefit, financially and by receiving things of value, from participation in a venture which has engaged in such acts, and

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<sup>1</sup> Victim-1, Victim-2, and Victim-3 are referred in this Superseding Indictment by the same identifiers (e.g., "Victim-1") assigned to them in the original Indictment returned on November 15, 2018. Victim-4 was not referenced in the original Indictment.

attempted to do so, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit, WONEY recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited, and attempted to do so, a female person, Victim-3, who was less than 18 years old, who was then caused to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to WONEY.

(Title 18, United States Code, Sections 1591(a), (b)(2),  
1594(a), and 2.)

### COUNT THREE

(Mann Act)

The Grand Jury further charges:

3. In or about November 2017, in the Southern District of New York and elsewhere, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, did knowingly transport an individual in interstate and foreign commerce, and in a Territory and possession of the United States, with intent that such individual engage in prostitution, and a sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, WONEY transported a female person, Victim-1, to multiple states, including from New York to New Jersey, with the intent that she engage in prostitution.

(Title 18, United States Code, Sections 2421(a) and 2.)

COUNT FOUR

(Use of an Interstate Facility to  
Promote, Manage, and Carry on Prostitution)

The Grand Jury further charges:

4. In or about September 2017, in the Southern District of New York and elsewhere, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, did knowingly use a facility in interstate and foreign commerce, with the intent to promote, manage, establish, and carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and thereafter performed and attempted to perform acts to promote, manage, establish and carry on, and to facilitate the promotion, management, and carrying on of such unlawful activity, to wit, WONEY used the Internet to promote, manage, establish, and carry on a criminal business engaged in prostitution involving female persons, including Victim-1 and Victim-2, in violation of New York Penal Law §§ 230.00, 230.20, and 230.25.

(Title 18, United States Code, Sections 1952(a)(3) and 2)

COUNT FIVE

(Felon in Possession of Ammunition)

The Grand Jury further charges:

5. On or about September 25, 2018, in the Southern District of New York and elsewhere, ISHI WONEY, a/k/a "Zoe,"

a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, after having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce ammunition, to wit, possessed CCI brand .22 LR caliber ammunition, which had previously been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

#### **FORFEITURE ALLEGATIONS**

6. As a result of committing the offenses alleged in Counts One and Two of this Indictment, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or facilitate the commission of the offense alleged in Counts One and Two, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense alleged in Counts One and Two, or any property traceable to such property.

7. As a result of committing the offense alleged in Count Three of this Indictment, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or

derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

8. As a result of committing the offense in Count Four of this Indictment, ISHI WONEY, a/k/a "Zoe," a/k/a "Z," a/k/a "Ish," a/k/a "Izy," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, that was used or intended to be used to commit or facilitate the commission as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;


(c) has been placed beyond the jurisdiction of the Court;


(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 2253(b), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1594, and 2428; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

ISHI WONEY,  
a/k/a "Zoe,"  
a/k/a "Z,"  
a/k/a "Ish,"  
a/k/a "Izy,"

Defendant.

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SUPERSEDING INDICTMENT

S1 18 Cr. 832 (LGS)

(18 U.S.C. §§ 1591(a), (b)(1), (b)(2),  
1594(a), 2421(a), 1952(a)(3), 922(g),  
and 2.)

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GEOFFREY S. BERMAN  
United States Attorney

A TRUE BILL

  
Foreperson

3/11/19

Filed Indictment

USMJ Gorenstein

me